

LAW OFFICE OF JUSTIAN JUSUF

A PROFESSIONAL CORPORATION

17011 Beach Blvd., Suite 900 • Huntington Beach, California 92647

Phone (714) 274-9815

Email: jjusuf@jusuf-law.com

May 22, 2026

California Labor & Workforce Development Agency (Via Electronic Filing):

<https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

Re: *Salahdin Farukh v. National Security Industries, also known as National Security Industries And Services; Michael Gerami*

To Whom It May Concern:

This office represents Salahdin Farukh (“Plaintiff”), a former employee of National Security Industries, also known as National Security Industries And Services and Michael Gerami (“Defendants”).

This letter is sent pursuant to Labor Code § 2699.3, for purposes of bringing a civil action by Plaintiff, on behalf of himself and all other similarly situated current and former employees of the Defendants (and potentially other defendants the identities of which are currently unknown to Plaintiff), against the Defendants, to seek civil penalties arising from various Labor Code violations discussed herein, as provided in the Labor Code Private Attorneys General Act (“PAGA”), codified at Labor Code § 2698, *et seq.*

Defendants are in the business of providing security guard and related services, employing approximately 400 hourly-paid employees in California (“Aggrieved Employees.”) Plaintiff was one of the Aggrieved Employees.

FAILURE TO PROVIDE ACCURATE WAGE STATEMENTS

Labor Code § 226(a) provides in relevant part:

An employer, semimonthly or at the time of each payment of wages, shall furnish to his or her employee, either as a detachable part of the check, draft, or voucher paying the employee’s wages, or separately if wages are paid by personal check or cash, an accurate itemized statement in writing showing ... (9) all applicable hourly rates in effect during the pay period and the corresponding number of hours worked at each hourly rate by the employee

Defendants paid Plaintiff and other Aggrieved Employees certain wages in lieu of benefits, but failed to show on their wage statements the applicable hourly rates in effect for

those wages during the pay period and the corresponding number of hours worked at each hourly rate by the employee, in violation of Labor Code § 226(a)(9).

PAGA CLAIMS

Plaintiff intends to bring a civil action for civil penalties pursuant to the PAGA regarding the foregoing Labor Code violations.

Pursuant to Labor Code § 2699.3, if we do not receive a response within 65 calendar days of this notice that the LWDA intends to investigate these alleged violations, Plaintiff may commence a civil action to seek civil penalties under PAGA.

Plaintiff intends to seek civil penalties against all those persons who may be liable under Labor Code § 558(a), which provides for recovery of civil penalties against an “employer or other person acting on behalf of an employer.” Plaintiff also intends to seek civil penalties against all those persons who may be liable under Labor Code § 558.1(a), which imposes liability of an employer to any “other person acting on behalf of an employer.”

Very truly yours,

LAW OFFICE OF JUSTIAN JUSUF, APC

By: 
Justian Jusuf

COPY:

VIA CERTIFIED MAIL:

National Security Industries, also known as
National Security Industries And Services
940 Park Avenue
San Jose, CA 95126

Michael Gerami
940 Park Avenue
San Jose, CA 95126